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VIA ECF

Honorable Arun Subramanian
Southern District of New York
500 Pearl Street, Courtroom 15A
New York, NY 10007

Edward W. Floyd
Partner | Attorney at Law
ed.floyd@zeilerfloydzad.com
mobile: (917) 999-6914

May 6, 2024

SUBJ.: *In Re: The Matter of the Application of Litasco SA for an Order to Take Discovery Pursuant to 28 USC 1782 (No. 23-MC-00354 [AS])*

Dear Judge Subramanian:

We are counsel for the Applicant, Litasco SA (“**Litasco**”), in the above-referenced miscellaneous proceeding. We submit this correspondence pursuant to the Court’s Order, entered March 26, 2024 (Dkt. 21), which directed the Applicant to “submit an update letter on May 6, 2024.”

This is a discovery proceeding pursuant to 28 U.S.C. § 1782. The Applicant’s prior status report, filed on March 22, 2024 (Dkt. 20), provided that between December 26, 2023 and January 2, 2024, the Applicant had arranged service on the seven respondents. As of that prior status report, two of the respondents had completed their productions, a third was expected to do so during the coming week, and a fourth had projected production for mid-April. The March 22 status report also stated that counsel had effective lines of communication with two additional respondents, and that counsel was attempting to identify the best line of communication with a third, remaining respondent.

As of present, productions have been made by four of the seven respondents. The below-signed attorney’s office has been in contact with each of the remaining three. Of those, one noted an intent to produce during mid- to late-April. That production has not yet been received, and counsel has sought an update. The other two remaining respondents have both indicated their intent to produce during mid-May.

While counsel does not anticipate that there will be a need for judicial intervention, the discovery process remains ongoing. As such, the below-signed attorney respectfully submits that he views those considerations as indicating that the matter should not be closed but that counsel should submit a further status report in 30 days.

Zeiler Floyd Zadkovich (US) LLP

33 East 33rd St. (9th Floor, Suite 905), New York, NY 10016 USA

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We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Edward W. Floyd
Edward W. Floyd

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